

Exhibit A

1 SUPERIOR COURT OF THE STATE OF CALIFORNIA

2 COUNTY OF ALAMEDA

3 BEFORE THE HONORABLE BRAD SELIGMAN

4 DEPARTMENT 23

5 ---000---

6 TERESA ELIZABETH LEAVITT
and DEAN J. MCELROY,

7 Plaintiffs,

8 No. RG17882401

9 vs.

10 JOHNSON & JOHNSON, et
al.,

11 Defendants.
12 _____/

13 REPORTER'S TRANSCRIPT OF TRIAL

14 (WILLIAM E. LONGO, Ph.D.)

15 Thursday, February 7, 2019

16 Full Session

17
18
19 Taken before EARLY K. LANGLEY
20 RMR, RSA, B.A.
21 CSR No. 3537

22
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1 A. That is correct.

2 Q. And that jump from 40 to 70 percent is due
3 exclusively to the more work you have in talc
4 litigation; right?

5 A. That is correct.

13:00:41

6 Q. You've testified as an expert in asbestos
7 litigation since the 1980s; right?

8 A. I think the first case was 1989 or 1990.

9 Q. Since you ran that ad that we still have up,
10 30 years ago you've given about 2500 to 3,000
11 depositions; true?

13:01:03

12 A. Since about 1989, 1990, when it started in
13 about 1991 and '92, that's true.

14 Q. On average, now, you have testified at least
15 once a week, every week for the last five years?

13:01:18

16 A. Yes. That is correct.

17 Q. Even more recently, you're having one to two
18 depositions per week; right?

19 A. Yes, sir.

20 Q. And 95 percent of the time that you're in
21 court, it's for plaintiffs attorneys in asbestos
22 litigation; true?

13:01:30

23 A. That is true.

24 Q. In fact, you've been designated as an expert
25 several thousand times by plaintiffs lawyers suing in

13:01:42

1 STATE OF CALIFORNIA)

2) ss.

3 COUNTY OF ALAMEDA)

4
5 I, EARLY K. LANGLEY, do hereby certify:

6 That foregoing proceedings were held in the
7 above-entitled action at the time and place therein
8 specified;

9 That said proceedings were taken before me at said
10 time and place, and was taken down in shorthand by me,
11 a Certified Shorthand Reporter of the State of
12 California, and was thereafter transcribed into
13 typewriting, and that the foregoing transcript
14 constitutes a full, true and correct report of said
15 proceedings that took place;

16 IN WITNESS WHEREOF, I have hereunder subscribed my
17 hand on February 7, 2019.

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EARLY K. LANGLEY, CSR NO. 3537
State of California